

1 Ct. 2521 (U.S. June 14, 2010), the ability to honor the assignment will depend on whether the fees are
2 subject to any offset allowed under the United States Department of the Treasury's Offset Program.
3 After the order for EAJA fees is entered, the government will determine whether they are subject to any
4 offset.

5 Fees and costs shall be made payable to Plaintiff, but if the Department of the Treasury
6 determines that Plaintiff does not owe a federal debt, then the government shall cause the payment of
7 fees and costs to be made directly to plaintiff's counsel Charles E. Binder, pursuant to the assignment
8 executed by Plaintiff. Any payments made shall be delivered to Plaintiff's counsel Charles E. Binder.

9 This stipulation constitutes a compromise settlement of Plaintiff's request for EAJA attorney fees
10 and does not constitute an admission of liability on the part of Defendant under the EAJA. Payment of
11 the agreed amount shall constitute a complete release from, and bar to, any and all claims that Plaintiff
12 and/or Plaintiff's counsel may have relating to EAJA attorney fees connection with this action.

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15 Respectfully submitted,

16 Date: April 19, 2017

Law Offices of Binder & Binder LLP

17
18 By: /s/ Daniel S. Jones*
DANIEL S. JONES
19 *By email authorization

20 Attorney for Plaintiff

21 STEVEN W. MYHRE
Acting United States Attorney

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23 By: /s/ Paul Sachelari
PAUL SACHELARI
24 Special Assistant United States Attorney

25 Attorneys for Defendant
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2 IT IS SO ORDERED:
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6 CARL W. HOFFMAN
UNITED STATES MAGISTRATE JUDGE

7 Dated: April 19, 2017
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CERTIFICATE OF SERVICE

I, Paul Sachelari, certify that the following individual was served with the **STIPULATION TO VOLUNTARY REMAND PURSUANT TO SENTENCE FOUR OF 42 U.S.C. § 405(g) AND TO ENTRY OF JUDGMENT** on the date and via the method of service identified below:

CM/ECF:

Daniel S. Jones
Binder & Binder, LLP
485 Madison Avenue, Suite 501
New York, NY 10022

Dated: April 19, 2017

/s/ Paul Sachelari
PAUL SACHELARI
Special Assistant United States Attorney